



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

RQ-2

Michael L. Retzer, Treasurer
Republican National Committee
310 First Street SE
Washington, DC 20003

Identification Number: C00003418

MAY 21 2003

Reference: August Monthly Report (7/1/02-7/31/02)

Dear Mr. Retzer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. The Act prohibits a political committee which is established and maintained by a national political party and any affiliated committees from accepting contributions in excess of \$15,000 in a calendar year from a multicandidate committee. 2 U.S.C. §441a(f)

The Commission notes your refund of the excessive contribution(s) disclosed on your Amended 30 Day Post-General Report. Although the Commission may take further legal action concerning the acceptance of an excessive contribution(s), your prompt action in refunding or transferring-out the contribution(s) will be taken into consideration.

-Schedule A supporting Line 15 of your report discloses a payment(s) from a federal candidate committee(s) for goods and/or services provided by your committee. 11 CFR §100.7(a)(1)(iii)(A) states that "...the provision of any goods or services without charge or at a charge which is less than the usual and normal charge for such goods or services is a contribution." Examples of goods and services include equipment, supplies, personnel, membership lists and mailing lists. The term "usual and normal charge" for goods is defined as "...the price of those goods in the market from which they ordinarily would have been purchased at the time of the contribution".

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The usual and normal charge for services is defined as "...the hourly or piecework charge for the services at a commercially reasonable rate prevailing at the time the services were rendered." 11 CFR §100.7(a)(1)(iii)(B)

Please clarify whether your committee assessed the usual and normal charge for the goods and/or services you provided to the federal candidate committee(s) and explain the steps your committee took in determining the amount(s) charged. If your committee provided the goods and/or services at less than the usual and normal charge, the difference between the two is considered to be an in-kind contribution by your committee to the federal candidate committee(s) and is subject to the limits set forth at 2 U.S.C. §441a. (11 CFR §100.7(a)(1)(iii)(A))

-Schedule B supporting Line 21(b) of your report discloses a payment(s) to another political committee(s) for goods and/or services provided by that committee(s). 11 CFR §100.7(a)(1)(iii)(A) states that "...the provision of any goods or services without charge or at a charge which is less than the usual and normal charge for such goods or services is a contribution." Examples of goods and services include equipment, supplies, personnel, membership lists and mailing lists. The term "usual and normal charge" for goods is defined as "...the price of those goods in the market from which they ordinarily would have been purchased at the time of the contribution". The usual and normal charge for services is defined as "...the hourly or piecework charge for the services at a commercially reasonable rate prevailing at the time the services were rendered." 11 CFR §100.7(a)(1)(iii)(B)

Please clarify whether your committee was assessed the usual and normal charge for the goods and/or services you received and explain the steps the political committee(s) took in determining the amount(s) charged to you. If your committee was provided the goods and/or services at less than the usual and normal charge, the difference between the two is considered to be an in-kind contribution by the political committee(s) to your committee and is subject to the limits set forth at 2 U.S.C. §441a. (11 CFR §100.7(a)(1)(iii)(A))

-Please clarify all expenditures made for BROADCAST SVS, VIDEO SVS, and PRODUCTION COST on Schedule(s) B and H4. If a portion or all of these expenditures were made on behalf of specifically identified

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federal candidates; this amount should be disclosed on Schedules B, E, or F supporting Lines 23, 24, or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1.

-Schedule H2 indicates the allocation ratio for P7 was revised during the reporting period. Please provide the date of the fundraising program or event. In the case of a telemarketing or direct mail campaign, the "date" is the last day of the telemarketing campaign, or the day on which the final direct mail solicitations are mailed. 11 CFR §106.5(f)(2) In the event that an excessive non-federal transfer was received, the excessive amount should be transferred back to your non-federal account.

-Line 1 and Line 5 of your Schedule 1 for your Republican National State Election Committee Non-Federal account discloses \$3,065,377.09 in receipts and \$416,071.15 in disbursements, respectively. However, the sum of the memo entries itemized on memo Schedule A equal \$2,948,833.35 and the sum of the memo entries itemized on memo Schedule B equal \$415,345.22. Please clarify these apparent discrepancies.

-Schedule F supporting Line 25 of the Detailed Summary Page discloses coordinated expenditures made on behalf of a federal candidate in which you disclose the subordinate committee to be John Cornyn for US Senate. A national party may make expenditures for candidates through any designated agent including any State or subordinate party political committees. The John Cornyn for US Senate committee does not qualify as a subordinate committee. Please amend your report to clarify this discrepancy.

A response or amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Scott Walker
Senior Campaign Finance Analyst
Reports Analysis Division

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

 Use separate schedule(s)
 or attach copy(ies) of this
 Detailed Summary Page

 FOR LINE NUMBER: **PAGE 5123/1001**

(check only one)

☐ 11a ☐ 11b ☒ 11c ☐ 12
☐ 13 ☐ 14 ☐ 15 ☐ 16 ☐ 17

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committees.

 NAME OF COMMITTEE (if any)
REPUBLICAN NATIONAL COMMITTEE

Full Name (Last, First, Middle Initial)

A. Enterprise Rental Car Company

Mailing Address

800 Corporate Park Drive
P.A.C.

City

State

Zip Code

St. Louis
MO
63105

Date of Receipt

07 / 02 / 2002

Amount of Cash Receipt this Period

20000.00

 FEC ID number of contributing
 federal political committee

000218642

 Name of Employer
 PAC

Occupation

PAC

Receipt For:

Aggregate Year-to-Date

☒ Primary

☐ General

Other (specify)

20000.00

 Transaction ID: **L11C200208101**

 Full Name (Last, First, Middle Initial)
Denison West Institute P.A.C.

Mailing Address

1700 N. Moore Street
NO 1800

City

State

Zip Code

Ardenmore
VA
22106

Date of Receipt

07 / 02 / 2002

Amount of Cash Receipt this Period

10000.00

 FEC ID number of contributing
 federal political committee

000024281

 Name of Employer
 PAC

Occupation

PAC

Receipt For:

Aggregate Year-to-Date

☒ Primary

☐ General

Other (specify)

10000.00

 Transaction ID: **L11C200208102**

Full Name (Last, First, Middle Initial)

G. LORRUE Lamp, Greene & Associates LLP

Mailing Address

125 West 59th Street
Mac Rab, L.L.P. P.A.C.

City

State

Zip Code

New York
NY
10019

Date of Receipt

07 / 29 / 2002

Amount of Cash Receipt this Period

3500.00

 FEC ID number of contributing
 federal political committee

000217885

 Name of Employer
 PAC

Occupation

PAC

Receipt For:

Aggregate Year-to-Date

☒ Primary

☐ General

Other (specify)

3500.00

 Transaction ID: **L11C200208193**

SUBTOTAL of Receipts This Page (optional)

33500.00

TOTAL This Period (last page this one FIMBAT only)

33500.00

F.B.C. Attachment A

(Revised 1/2000)

SCHEDULE F (FEC Form 3X)**ITEMIZED COORDINATED EXPENDITURES MADE BY
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE****(2 U.S.C. §441a(d))****(To be used only by Political Committees in the General Election)**

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FOR LINE 25 OF FORM 3X

NAME OF COMMITTEE (in Full)			
REPUBLICAN NATIONAL COMMITTEE			
Has your committee been designated to make coordinated expenditures by a political party committee? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		Full Name of Subordinate Committee JOHN CORNYN FOR US SENATE	
If YES, name the designating committee:		Mailing Address 807 BRAZOS ST SUITE 200	
		City AUSTIN	State ZIP Code TX 78701
Full Name (Last, First, Middle Initial) of Each Payee NATIONAL MEDIA, INC.		Purpose of Expenditure MEDIA BUY	ORG Category/ Type
Mailing Address 211 N. UNION ST. SUITE 200		Date	
City State ZIP Code ALEXANDRIA VA 22314		M D Y 07 28 2002	
Name of Federal Candidate Supported JOHN CORNYN FOR US SENATE	Office Sought: <input checked="" type="checkbox"/> Senate <input type="checkbox"/> House <input type="checkbox"/> Presidential	State: TX District:	Amount 793611.00
Aggregate General Election Expenditure for this Candidate 802166.62 Transaction ID: L25F0103311176			
Full Name (Last, First, Middle Initial) of Each Payee NATIONAL MEDIA, INC.		Purpose of Expenditure MEDIA BUY	ORG Category/ Type
Mailing Address 211 N. UNION ST. SUITE 200		Date	
City State ZIP Code ALEXANDRIA VA 22314		M D Y 07 29 2002	
Name of Federal Candidate Supported JOHN CORNYN FOR US SENATE	Office Sought: <input checked="" type="checkbox"/> Senate <input type="checkbox"/> House <input type="checkbox"/> Presidential	State: TX District:	Amount 8555.62
Aggregate General Election Expenditure for this Candidate 802166.62 Transaction ID: L25F0103311177			
SUBTOTAL of Expenditures This Page (optional) 802166.62			
TOTAL This Period (last page this line number only) 802166.62			

2014年11月13日 星期三